



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

September 28, 2010

MEMORANDUM

SUBJECT: Medley Farm Drum Dump NPL Site

FROM: Ralph O. Howard, Jr. RPM *Ralph O. Howard, Jr.*
Superfund Remedial & Site Evaluation Branch

TO: Franklin E. Hill, Director
Superfund Division

The purpose of this memorandum is to present an Explanation of Significant Differences (ESD) for the Medley Farm Drum Dump Superfund Site (the Site), located in Gaffney, Cherokee County, South Carolina for your concurrence. The remedy for the site was selected in a May 29, 1991 Record of Decision (ROD).

The major components of the remedy selected in the 1991 ROD were the construction and operation of a soil vapor extraction (SVE) system to treat contaminated subsurface soils, the construction and operation of a groundwater pump-and-treat system to remediate contaminated groundwater, and long-term monitoring of site groundwater and surface water.

ICs in the form of a restrictive covenant need to be implemented at the Site because the remedial action results in hazardous substances, pollutants, or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure (UU/UE) of groundwater. The remedial action selected in the 1991 ROD did not include ICs. As a result, an explanation of significant differences is needed to include ICs as part of the remedy for the Site. A restrictive covenant will assure the integrity and maintenance of the remedy implemented at the Site. The terms and conditions of the restrictive covenant will constitute a perpetual servitude on the property and run with the property.

EPA has prepared this ESD in cooperation with the South Carolina Department of Health and Environmental Control (SCDHEC). EPA believes the remedy as set forth in the 1991 ROD, as clarified by this ESD, remains protective of human health and the environment. Since this action only incorporates the ICs, but no change in the treatment technology or remedial action objectives, it does not represent a fundamental change to the selected remedy. Therefore an ESD is appropriate to add ICs to address groundwater contamination for the Site.

Attached is a copy of the fact sheet that will be distributed to the public. I recommend that you concur with this ESD so that it may be added to the Administrative Record.


Attachment (1)



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Concurrence: 

Franklin E. Hill
Director
Superfund Division

Date: 9/30/2010